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October 20, 2025

The Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
255 Cadman Plaza East
Brooklyn, New York 11201

United States v. Shares of 21 East 61st Street Apartment Corp. et al.
Civil Docket No. 24-2147

Dear Judge Kovner:

Our firm represents Lovitas, Inc. and Baloas, Inc., the corporate entities that own the properties at issue in this civil forfeiture action, and Dr. Hak Seon Kim ("Dr. Kim"), the ultimate beneficial owner of the properties (collectively, the "Claimants").

On September 21, 2025 the Court directed the parties to file a joint status report by today's date. We respectfully request that the Court allow us an additional week to file the joint status report. This will give us additional time to confer with our client and to propose a schedule to the government.

Respectfully,

Douglas A. Kellner

Douglas A. Kellner
Attorneys for Claimants